



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

NOV 21 2005

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U.S. EPA, Region 9
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Mr. Donald L. Richey
Arizona Department of Environmental Quality
1110 W. Washington St.
Phoenix, AZ 85007

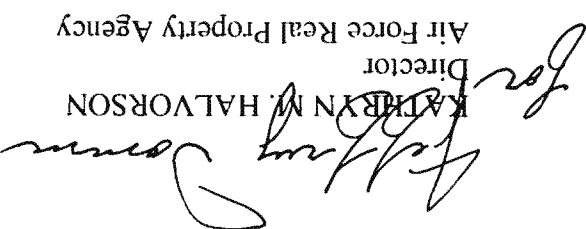
Dear Ms. Johnson and Mr. Richey

This letter acknowledges receipt of the October 17, 2005 joint letter from the U. S. Environmental Protection Agency, Region IX (EPA) and the Arizona Department of Environmental Quality invoking formal dispute on the Liquid Fuel Storage Site (ST12) at the former Williams Air Force Base, Arizona.

Protecting human health and the environment remains the goal and basis for the Air Force undertaking and continuing environmental cleanup at Williams Air Force Base. Currently, we are performing active remediation of ST-12 by operating a full scale Soil Vapor Extraction (SVE) treatment system for deep soils for source control. There was some downtime with this system after the Internal Combustion Engine system went down and required replacement. The system went back on line in April 2005. Since 1997, this system has removed the equivalent of 370,000 gallons of fuel from the soil. We feel that the deep soil remedy in place will be just as successful as the shallow soil remedy was. The challenge remaining at ST-12 is the effective cleanup of the groundwater.

As with any remedy, the results must be balanced between overall protection of human health and the environment and the costs to the taxpayers to attain that protection. The decision to discontinue the installation of the TEE system at ST-12 was not taken lightly; however, we believe it was the right decision based on the available data. The data did not indicate that the TEE system would be necessary in providing overall protection of human health and the environment. Our failure was not in the decision, but in our failure to communicate with the

Air Force Real Property Agency
Director
KATHRYN M. HALVORSON



Sincerely

My Air Force representative for the November 30 meeting will be Mr. Dexter Cochonauer.
who can be reached at (916) 643-6420, ext 100.

In an effort to make the DRC a more effective venue for resolving disputes, we propose the selection of a neutral facilitator agreed to by all parties, whose responsibility will be to keep the DRC a fair and balanced process, as well as document the proceedings and the outcome. We are more than willing to consider the use of a facilitator from the EPA Office of Facilitation. Laurie Lewis has been recommended as an outstanding facilitator; however, we would consider some other neutral facilitator that is acceptable to all parties.

In keeping with the letter from SA/IE dated March 23, 2005, we still believe there are better alternatives available to affect the cleanup of ST-12. We continue to hope that EPA Region IX and ADEQ will sit down with the Air Force and explore other alternatives that would be more effective technically, as well as more economical and less onerous on the U.S. taxpayer. The initial meeting of the parties on August 26, 2005, was a missed opportunity for everyone to work together and come up with a plan for finding a remedy that all parties could agree to. We believe the Dispute Resolution Committee (DRC) is another opportunity we should take advantage of to come up with a remedy that all parties can agree to. The Air Force has initiated a Request for Information (RFI) from the commercial sector to determine if there are any new and innovative remedies for a site like Williams. The results of the RFI will be available by mid January 2006.

EPA and ADEQ and discuss our decision. Coming up with a successful remedy for the groundwater at ST-12 is a challenge that will require partnering among all stakeholders.